

Before the
Federal Communications Commission
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Amendment of the Amateur Service)
Rules to Include Novice Class)
Operator License Examinations)
in the Volunteer-Examiner)
Coordinator Examination System)

PR Docket No. 92-154

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MAIL BRANCH

The joint ARRL and W5YI-VEC petition to include Novice testing under the VEC system is fatally flawed. Their only interest in this proceeding is to increase their own revenues by forcing Novices to test under the VEC system. My experience in this matter consists of 4 years of teaching Novice/Technician classes. As a volunteer instructor for our local amateur radio club, the Morgan County Repeater Association, my experience indicates that including Novice testing under the VEC system will mean the death of the Novice license, a serious decline in the number of amateurs who upgrade, and eventual loss of some of our HF bands due to lack of use.

I would like to address some of the arguments that the ARRL and W5YI use in support of this petition, and include observations from my own experience. First, I question the wisdom of throwing out a system that has served the amateur community well for 40 years. The Novice testing system should remain as it is. I have always offered Novice testing as part of my class. In four years, only three people have passed the code test on the first try. Everyone else needed 2, 3, or more tries, so I would give a code test every week until the majority of people were able to pass. Under VEC testing, they would get one shot and that's it. Honestly, how many people are going to keep

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trying to get the code when they have to pay \$5.40 each time? How many potential Novices are you willing to throw in the garbage? Let's face it, code is difficult. Why not give these people every possible chance to pass? That would not be possible under the VEC system.

Let me share my experience since the codeless Tech license became available. Most people, with my encouragement, tried to master the code. Some found it a little difficult, and human nature being what it is, dropped the code and went for codeless Tech. Not one of my no-code Techs has upgraded to Tech Plus or even began to study the code. Not one! I don't know what the ARRL and W5YI think will happen if Novice testing becomes a part of VEC testing. Most people taking the code are extremely nervous and appreciate being able to take the test in a familiar classroom with a familiar teacher. Many will not pass if they have to go to an unfamiliar VEC session with people they don't know. People are inclined to take the easiest route, which is no-code Tech. Can't we give the hardworking people who are willing to study the code a break? While none of my no-codes have upgraded, I have several Novices who are now Generals and higher. Let's support these people all we can.

Contrary to what the ARRL and W5YI state, it is very difficult to recruit volunteer examiners who are willing to come to a class for several weeks. I had a hard time finding one person who was willing. As for finding two more, who also must be accredited VEs, you can just forget it! Couple that with the requirement of giving public notice of each exam session, collecting money, filling out VEC paperwork, etc., and you can see that Novice testing in the typical amateur radio class soon becomes impossible. So I also am out all the money that I

have invested in testing equipment over the years. Another technique that I use to overcome nervous test takers is that I don't even announce that I'm giving a test. If they can copy code without thinking they're being tested, many will pass. This would be impossible under the VEC system since they will know they are being tested. So you see, not only would I be forced to discontinue weekly testing, but I would have to discontinue testing altogether.

Some students were able to test out early and receive their license FAST! This would also be impossible under the VEC system since they would have to wait for a formal test session. I even offer Element 2 testing for no-codes, so that they only have one test to take at the VEC session. This increases the pass rate, and once again, would not be allowed under this ill-fated proposal. Some students come to me months after the class is over to take their Novice test. I can recruit a fellow ham and give the exams on a moments notice, whenever they feel ready. Once again, not allowed under the VEC system. Can you see how the number of Novices will drop dramatically, if anyone even bothers to try the code at all?

Let my address some other points made by the ARRL and W5YI. I have never had a 610 form returned for any reason. My examiner and I check and recheck each 610 to make sure it's right. Why punish us because some careless people make mistakes? Once again, Big Brother Government punishes everyone for the mistakes of a few. VECs make mistakes too, you know.

W5YI even accuses some Novice examiners of cheating, or of being too dumb to keep track of outdated questions. This is outrageous to me! I have never signed a 610 form for anyone who didn't earn it. I

get my exams from ARRL and double check all the magazines to keep track of outdated questions. I'm sure that all hard-working Novice examiners do the same. There does not need to be formal communication with a VEC to delete outdated questions if you are on top of things. With the availability of pre-printed tests from ARRL, this is not even an issue.

Let's not forget the cost of once again having to revise Form 610, and the confusion that will result from people using old forms and thinking they can be tested by two Generals or higher.

My youngest student was six years old when he passed. He would not have had a chance in the complex regulated atmosphere of a formal test session. Are we going to throw away young hams such as him so ARRL and WSYI can collect more test fees? Since they have a vested interest in this proposal, their arguments are not credible to me.

In conclusion, if it's not broke, why fix it? Do we need more silly government regulation of something as simple as a Novice test? Or do we want to give every possible break to those with the determination to study code? If this proposal becomes law, I predict a dramatic decline in the number of new Novices to the point of extinction. Then we hams stand to lose our soon-to-be underpopulated HF bands as the oldtimers die off. Please don't let this happen.

The purpose of codeless Tech was to make entry into ham radio easier. Then why are we making a Novice license more difficult to obtain? It doesn't make sense. If this proposal passes, I will probably discontinue teaching ham classes in disgust. Many of my fellow instructors feel the same way. We're not fighting for us, we already have our licenses. We're fighting for our future students who

will never have the pleasure of a DX contact. Without the multiple chances and familiar surroundings that Novice testing offers, many will never pass code or even attempt it.

The ARRL should follow the advice that it offers on page 14-18 of its FCC Rule Book: ". . . at all times we must minimize our tendency to complain and/or formally petition the FCC for narrow or overly restrictive rules interpretations, particularly for emotional reasons." Ladies and gentlemen, if you want dedicated instructors like myself to continue to help new hams, then please defeat PR Docket No. 92-154 and leave Novice testing alone.

A handwritten signature in cursive script that reads "Steven Vail".

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